



Proceeding: WT 03-187

Please accept these comments in response to the Commissioners Notice of Proposed Rulemaking for WT Docket 03-187, In the Matter of Effects of Communications Towers on Migratory Birds.

South Dakota is a rural state with a sparse population over its 75,000+ square miles that relies on communications towers to provide such public services as broadcasting and wireless telephone service, along with government/first responder services such as two-way radio communications, and mobile data services. Because of the reliance of South Dakotans on the services provided through these communications towers, I submit the following for your consideration:

South Dakota needs new communications towers

South Dakota still has some areas that are underserved by both private and public services. Generally those areas are the most sparsely populated without existing tower infrastructure to collocate on, requiring new structures to offer the services.

We do not support a tower height limitation of 200 feet or lower

Wireless communications towers in South Dakota are in most part driven by a coverage need rather than one of capacity. For example, of the 58 larger communications grade towers owned by the state to provide broadcast and public safety communications, 45 are 200 feet or taller. Of those 45 towers 12 are 400 feet or taller, ranging up to 1696 feet for one of the broadcast towers. Towers of this size are required to make best use of the VHF frequencies used for broadcast and public safety communications in the state.

We do not support regulation limiting the use of guy wires

The larger towers in use by the State of South Dakota generally are guyed because of economics and weather conditions. Because of wind and icing considerations, guyed towers are the prevalent construction method in the state because of their survivability. Where practical the state has constructed self-supporting towers, ranging from 100 feet to 180 feet at three sites.

We do not support a change to strobe-type obstruction lighting

The 45 towers owned by the state requiring obstruction lighting are lighted primarily by incandescent red lighting. The five towers that do have strobe-type lighting were equipped so because of their proximity to roadways and were subject to Visual Flight Rules (VFR) requirements. The financial impact to the State of South Dakota to retrofit the balance of these towers with a strobe-type lighting system would be considerable, as none of the current lighting system is compatible. There will also be higher maintenance costs associated with having active components on the tower as opposed to having all active components in the shelter.

We support the collocation of antennas on existing towers where practical

The state is currently collocated on ten additional towers that are not state-owned and of the 58 total state-owned towers, 43 are being utilized by more than one licensee. We support this to the extent possible.

Thank you for the opportunity to provide these comments.

Jeff Pierce--Technical Administrator